

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN WILSON and
CHARLES STILL,

Plaintiffs,

- against -

EDWARD "EDDIE" PERRELL d/b/a PERRELL
MUSIC, DYNATONE PUBLISHING COMPANY,
WARNER CHAPPELL MUSIC, INC.,
UNIVERSAL MUSIC GROUP, INC.,
BROADCAST MUSIC INC. (BMI), and
ANHEUSER-BUSCH COMPANIES, INC.

Defendants.

Civil Action No.: 16 Civ. 00104 (PAE)

ECF Case

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Complaint and Cross-Complaint on file herein, and the Memorandum of Law in Support of Motion to Dismiss dated August 1, 2016 and accompanying Declaration of Robert A. Jacobs executed on August 1, 2016 and exhibits thereto submitted by Defendants UMG Recordings, Inc. ("UMG") (sued incorrectly as Universal Music Group, Inc.), Unichappell Music, Inc. (sued incorrectly as Warner/Chappell Music, Inc.) and Dynatone Publishing Company (collectively, "Defendants"), and all prior proceedings and filings herein, Defendants, by and through their undersigned attorneys, will move this Court, before the Honorable Paul A. Engelmayer, at the Thurgood Marshall United States Courthouse, Courtroom 1305, 40 Foley Square, New York, New York 10007, at a date and time to be determined by the Court, for an Order pursuant to Fed. R. Civ. P. 12(b)(6) dismissing with prejudice all claims of Plaintiffs John Wilson and Charles Still against Defendants and the cross-

claim of Defendant Edward Perrell against UMG; and for any other and further relief the Court deems equitable and just.

Dated: New York, New York
August 1, 2016

Respectfully submitted,
MANATT, PHELPS & PHILLIPS, LLP

By: /s/ Robert A. Jacobs

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